

EXHIBIT F



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Re: **Discovery in CCDA Revenue Bond Adversary Proceeding, No. 20-00004**

Counsel:

We write in response to your letter dated March 31, 2021. AAFAF, as fiscal agent for the Tourism Company, is providing the below-listed information in response to the requests in your March 31 letter and Request Nos. 8–11 of *Defendants' Second Set of Document Requests for the Production of Documents in Connection with the CCDA Revenue Bond Adversary Proceeding*. For clarity, this letter repeats both the corresponding headings from the March 31 letter and the request numbers from Defendants' second set of document requests.

CCDA Flow of Funds

Request Nos. 8–9

Defendants requested information regarding transfers into the GDB -9758 account listed as "TRANF. RECIBIDA DE BPPR" and "BOOK BAL ROOM TAX TURISMO" in CCDA_STAY0016468 and CCDA_STAY0016472.

Personnel from AAFAF were able to retrieve screen prints from GDB's Security Investment System software providing some additional detail regarding those transfers, which AAFAF is producing today. See CCDA_STAY0017613–CCDA_STAY0017631. Those screen shots identify the bank account that was the source of the transfers in the transfer description as Banco Popular account [REDACTED] 6545. AAFAF already produced all available account statements and documents relating to this account. See CCDA_STAY0006943–CCDA_STAY0006947, CCDA_STAY0001551–CCDA_STAY0001639, CCDA_STAY0014494–CCDA_STAY0014540.

The Tourism Company conducted a reasonably diligent search, as described in our April 6, 2021 letter, and was not able to locate any further information in its records.

Request No. 10:

Defendants requested documents sufficient to show the recipient of certain enumerated transfers listed on account statements for the FirstBank -3961 account. The recipient of each of these transfers is the Tourism Company. The FirstBank -3961 includes both a checking and a savings account. As shown in the table below, all of the transactions listed in Request No. 10 involve internal transfers or correction of mistaken transfers between the FirstBank -3691 checking account to the -3961 savings account.

Date	Defendants' Description	Response	Supporting Document
January 22, 2020	Withdrawal of \$3,033,456.25 out of FirstBank -3961. (CCDA_STAY0014371.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014371
February 20, 2020	A withdrawal of \$3,033,456.25 out of FirstBank -3961. (CCDA_STAY0014375.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014375
March 27, 2020	Withdrawal of \$3,033,456.25 out of FirstBank -3961. (CCDA_STAY0014377.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014377
April 29, 2020	Withdrawal of \$38,495.32 out of FirstBank -3961. (CCDA_STAY0014379.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014379
May 4, 2020	Withdrawal of \$3,033,456.25 out of FirstBank -3961. (CCDA_STAY0014382.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014382
August 4, 2020	Withdrawal of \$16,371.25 out of FirstBank -3961.	Correction of mistaken duplicate transfer from	CCDA_STAY0014387, CCDA_STAY0014389

Date	Defendants' Description	Response	Supporting Document
	(CCDA_STAY0014389.)	FirstBank -3961's checking account to FirstBank -3961's savings.	
September 29, 2020	Withdrawal of \$1,693.58 out of FirstBank -3961. (CCDA_STAY0014392.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014392
December 28, 2020	Withdrawal of \$6,067,562.50 out of FirstBank -3961. (CCDA_STAY0014398.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014398
January 26, 2021	Withdrawal of \$3,033,781.25 out of FirstBank -3961. (CCDA_STAY0014373.)	Internal transfer from FirstBank -3961's checking account to FirstBank -3961's savings account.	CCDA_STAY0014373

Recipients of Transfers

Request No. 11:

Defendants requested information to identify the recipient and purpose of certain transfers out of the Scotiabank -5138 account (Tourism Company's "Public Funds Account" used for supplier payments) and also out of the Banco Popular -2306 account (Tourism Company's "COMPUTADORA SUPLIDORES LASER" used as a savings account). As shown in the table below, these transfers were either payments to the Tourism Company's suppliers, disbursements to casino operators, payments to the Puerto Rico Direct Marketing Organization, or transfers to the Tourism Company's FirstBank -3961 account.

Date	Defendants' Description	Response	Supporting Document
January 14, 2020	Withdrawal of \$3,413,573.11 out of Scotiabank -5138. (CCDA_STAY0012669.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0012669– CCDA_STAY0012741 CCDA_STAY0017577– CCDA_STAY0017579

Date	Defendants' Description	Response	Supporting Document
February 10, 2020	Withdrawal of \$9,914,773.40 out of Scotiabank -5138. (CCDA_STAY0012742.)	Monthly disbursement to casino operators based on percentage of slot machine revenues.	CCDA_STAY0012742– CCDA_STAY0012840 CCDA_STAY0017605– CCDA_STAY0017608
April 30, 2020	Withdrawal of \$1,343,475.37 out of Scotiabank -5138. (CCDA_STAY0014541.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0014541– CCDA_STAY0014548 CCDA_STAY0017585– CCDA_STAY0017588
May 1, 2020	Withdrawal of \$2,500,000.00 out of Scotiabank -5138. (CCDA_STAY0014737.)	Payment to the Direct Marketing Organization of Puerto Rico for its operations.	CCDA_STAY0014737– CCDA_STAY0014761
May 8, 2020	Withdrawal of \$3,851,650.50 out of Scotiabank -5138. (CCDA_STAY0014737.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0014737– CCDA_STAY0014761 CCDA_STAY0017589– CCDA_STAY0017591
June 25, 2020	Withdrawal of \$1,019,384.86 out of Scotiabank -5138. (CCDA_STAY0014705.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0014705– CCDA_STAY0014736 CCDA_STAY0017598– CCDA_STAY0017604
July 6, 2020	Withdrawal of \$4,500,000.00 out of Scotiabank -5138. (CCDA_STAY0014660.)	Payment to the Direct Marketing Organization of Puerto Rico for its operations.	CCDA_STAY0014660– CCDA_STAY0014704
August 17, 2020	Withdrawal of \$3,805,929.63 out of Scotiabank -5138. (CCDA_STAY0014549.)	Monthly disbursement to casino operators based on percentage of slot machine revenues.	CCDA_STAY0014549– CCDA_STAY0014602 CCDA_STAY0017609– CCDA_STAY0017612

Date	Defendants' Description	Response	Supporting Document
September 10, 2020	Withdrawal of \$993,219.32 out of Scotiabank -5138. (CCDA_STAY0014821.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0014821– CCDA_STAY0014853 CCDA_STAY0017567– CCDA_STAY0017571
October 8, 2020	Withdrawal of \$615,457.25 out of Scotiabank -5138. (CCDA_STAY0014783.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0014783– CCDA_STAY0014820 CCDA_STAY0017592– CCDA_STAY0017597
December 3, 2020	Withdrawal of \$645,234.89 out of Scotiabank -5138. (CCDA_STAY0014603.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0014603– CCDA_STAY0014622 CCDA_STAY0017572– CCDA_STAY0017576
December 7, 2020	Withdrawal of \$11,799,505.81 out of BPPR -2306. (CCDA_STAY0014486.)	Reversal of mistaken December 4, 2020 transfer from another Tourism Company account.	CCDA_STAY0014486– CCDA_STAY0014489
December 29, 2020	Withdrawal of \$6,067,562.50 out of BPPR -2306. (CCDA_STAY0014486.)	Transfer to Tourism's FirstBank -3961 account.	CCDA_STAY0014486– CCDA_STAY0014489 CCDA_STAY0014398– CCDA_STAY0014399
February 11, 2021	Withdrawal of \$3,068,701.86 out of Scotiabank -5138. (CCDA_STAY0014623.)	Withdrawal to fund payments to Tourism Company suppliers.	CCDA_STAY0014623– CCDA_STAY0014644 CCDA_STAY0017580– CCDA_STAY0017584

Sincerely,

/s/ Elizabeth L. McKeen

Elizabeth L. McKeen